

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION

TABATHA R. DRAKE	§	
Plaintiff	§	
	§	
VS	§	Case No. 1:24-cv-01562
	§	
BUC-EE’S, LTD., BUC-EE’S	§	JURY TRIAL REQUESTED
MANAGEMENT, LLC, and BUC-	§	
EE’S SERVICES, LLC, individually	§	
and collectively d/b/a, BUC-EE’S,	§	
Defendants	§	

**JOINT MOTION TO STAY PROCEEDINGS, COMPEL ARBITRATION, AND
ADMINISTRATIVELY CLOSE THE CASE**

Pursuant to the Federal Arbitration Act (“FAA”), 9 U.S.C. § 1 *et seq.*, Plaintiff Tabatha Drake (“Plaintiff”) and Defendants Buc-ee’s, Ltd., Buc-ee’s Management, LLC, and Buc-ee’s Services, LLC (“Defendants”) (collectively, the “Parties”) move this Court to compel arbitration of the claims Plaintiff has asserted in Plaintiff’s Original Complaint (the “Complaint”) (Dkt. 1), to stay proceedings pending arbitration, and to administratively close the case. In support thereof, the Parties state as follows:

1. On December 20, 2024, Plaintiff served Defendants with a copy of the Summons and Complaint (Dkt. 4-6).
2. On January 10, 2025, Defendants filed an Agreed Motion for Extension of Time to Answer or Otherwise Respond, which provides that Defendants may have until February 10, 2025 to respond to the Complaint (Dkt. 7).
3. The Parties have met and conferred regarding the appropriate venue for this dispute, and the Parties stipulate and agree that: (a) Plaintiff entered into a binding arbitration agreement

with Buc-ee's Ltd.; and (b) the claims at issue in this case fall within the scope of the agreement's arbitration clause.

4. Accordingly, the parties hereby jointly move the Court to stay the proceedings and order the parties to arbitrate their dispute.

WHEREFORE, the Parties jointly request that this Court enter the Agreed Order submitted with this Joint Motion to Stay Proceedings and Compel Arbitration.

Date: February 10, 2025

Respectfully submitted,

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ATTORNEYS FOR PLAINTIFF

TABATHA R. DRAKE

CERTIFICATE OF CONFERENCE

The undersigned certifies that counsel for the parties have conferred in good faith to reach the agreements set forth in this motion.

/s/ Taylor Appling
Taylor Appling

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of this document has been served on all counsel of record via the Court's electronic filing system on February 10, 2025.

/s/ Taylor Appling
Taylor Appling